

REMARKS

Claims 2, 3, and 11-23 are all the claims pending in the application. In order to expedite prosecution, Applicants amend claims 1 and 11 by this Amendment. Claim 4 has been canceled without prejudice or disclaimer.

Claim Rejections - 35 U.S.C. § 103

Claims 2-4 and 11-22 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over U.S. Patent No. 5,727,310 to Casson *et al.* (“Casson”) in view of U.S. Patent No. 6,323,559 to Chan *et al.* (“Chan”), and further in view of U.S. Patent No. 6,670,559 to Centola *et al.* (“Centola”). Claim 23 is rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Casson in view of Centola. For *at least* the following reasons, Applicants respectfully traverse the rejection.

Applicants respectfully submit that claim 2 is patentable over the alleged combination of Casson, Chan, and Centola. For example, claim 2 relates to a circuit board unit comprising, *inter alia*, a pressurizer pressurizing said first substrate, said anisotropic electrical conductor, and said second substrate wherein said first substrate, said anisotropic electrical conductor, and said second substrate are caused to electrically connect to each other. The pressurizer is composed of a material having a spring characteristic.

Casson merely suggests a multi-layered wiring substrate (*see* Casson: Abstract, col. 7, lines 43-55). Casson does not disclose or suggest that its invention is applicable to electrically connecting a first substrate and a second substrate to each other (to which the present invention, as claimed, relates). Thus, Casson fails to provide any motivation to attain the present invention.

Chan merely suggests pad arrangement for flip-chip connection (*see* Chan: Abstract, col. 4, lines 1-40). Nowhere in Chan is it taught or suggested that its pad arrangement is applicable to electrically connecting a first substrate and a second substrate to each other. As such, Chan also fails to provide any motivation to achieve the present invention.

With regards to Centola, the Examiner contends that Centola, in col. 5, lines 20-25, suggests a pressurizer that is composed of a material having a spring characteristic. It appears that the Examiner is interpreting Centola's teaching of a "compressible plate 900" in the cited portion as the claimed pressurizer having a spring characteristic. However, Centola's plate 900 is referred to as compressible because it has a wedge-shaped member 920 engaged through the based of member 400" which allows for slidable movement (Centola, col. 4, line 65 to col. 5, line 2). That is, in Centola, the plate 900 is moved to push the PCB 100, by pushing the wedge 920 into the screw 940. Neither the plate 900 nor the wedge 920 has a spring characteristic unlike the present invention, as set forth in claim 2.

In addition, Applicants respectfully submit that Centola does not teach or suggest that the U-shaped member 400, shown in FIG. 4 of Centola, has a spring characteristic.

In view of the foregoing, Applicants respectfully submit that a skilled artisan would not be motivated to combine the teachings of Casson, Chan, and Centola. Moreover, as shown above, even if the teachings of Centola were incorporated into the combined teachings of Casson and Chan, the resulting circuit board would still not include a pressurizer which is composed of a material having a spring characteristic as required by claim 2. Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. § 103(a) rejection.

Independent claims 11, 18, and 23 recite features similar to those discussed above with respect to claim 2. Therefore, they are patentable for *at least* reasons similar to those given above with respect to claim 2.

Claims 3, 12-17, and 19-22 are patentable *at least* by virtue of their dependency. Since claim 4 has been canceled, the rejection thereto is rendered moot.

Conclusion

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



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